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Attorney for Plaintiffs
MARY NAYLOR and
CHRISTOPHER NAYLOR

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARY NAYLOR, an individual, and
CHRISTOPHER NAYLOR, an individual,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

OMNI FINANCIAL OF NEVADA, INC.
d/b/a OMNI FINANCIAL and OMNI
MILITARY LOANS, a Nevada Corporation,

Defendant.

Case No: 2:21-cv-00272-JCM-EJY

**JOINT STIPULATION RE AMENDED
CLASS ACTION COMPLAINT**

TO THE HONORABLE COURT, THE PARTIES, AND THEIR RESPECTIVE
ATTORNEYS OF RECORD:

Plaintiffs MARY NAYLOR and CHRISTOPHER NAYLOR and Defendant OMNI
FINANCIAL OF NEVADA, INC., by and through their respective attorneys of record, hereby
stipulate as follows:

1 **WHEREAS**, on February 18, 2021, Plaintiffs filed their Class Action Complaint (Dkt.
2 1) against Defendant;

3 **WHEREAS**, on March 15, 2021, Defendant filed a Motion to Dismiss the Complaint
4 with Prejudice or, in the Alternative, to Strike the Class Allegations (Dkts. 10 and 11);

5 **WHEREAS**, on March 25, 2021, Plaintiffs filed an Amended Class Action Complaint
6 (Dkt. 12) pursuant to Federal Rule Civil Procedure 15(a)(1)(B);

7 **WHEREAS**, the filing of the Amended Class Action Complaint rendered the Motion to
8 Dismiss the Complaint with Prejudice or, in the Alternative, to Strike the Class Allegations
9 moot;

10 **WHEREAS**, the deadline for Defendant to answer or otherwise respond to the
11 Amended Class Action Complaint is April 8, 2021; and

12 **WHEREAS**, the parties have met and conferred and, subject to the Court's approval,
13 have agreed to the following schedule for Defendant's response to the Amended Class Action
14 Complaint and any associated briefing deadlines that would be triggered by Defendant
15 responding by motion.

16 **NOW, THEREFORE**, in consideration of the foregoing, Plaintiff and Defendant
17 hereby **STIPULATE** and **AGREE** as follows:

18 1. The Motion to Dismiss the Complaint with Prejudice or, in the Alternative, to
19 Strike the Class Allegations is moot;

20 2. Defendant shall answer or otherwise respond to the Amended Class Action
21 Complaint no later than April 30, 2021;

22 3. If Defendant responds to the Amended Class Action Complaint by motion,
23 Plaintiffs' deadline to file their opposition is May 21, 2021; and

24 4. If Defendant responds to the Amended Class Action Complaint by motion and
25 Plaintiffs oppose that motion, Defendant's deadline to file its reply is June 11, 2021.

1 DATED: April 5, 2021

WEBB, KLASSE & LEMOND, LLC

2 By: /s/ E. Adam Webb
3 E. Adam Webb

4 Attorney for Plaintiffs MARY NAYLOR
and CHRISTOPHER NAYLOR

5 DATED: April 5, 2021

GREENBERG TRAURIG, LLP

6 By: /s/ Jacob D. Bundick
7 Jacob D. Bundick

8 Attorney for Defendant OMNI
9 FINANCIAL OF NEVADA, INC.

10 IT IS SO ORDERED.

11 By: 
12 UNITED STATES MAGISTRATE JUDGE

13 Dated: April 5, 2021